

# Holland & Knight

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March 7, 2014

Mr. Jeff S. Jordan  
Supervisory Attorney  
Complaints Examination & Legal Administration  
Office of General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re: MUR 6734 - Amy Goldman Fowler

Dear Mr. Jordan:

This amended response is submitted on behalf of Mrs. Amy Goldman Fowler and should be considered in conjunction with the June 28, 2013 response and September 3, 2013 amended response previously submitted on her behalf.

As stated in our September 3, 2013 correspondence, after carefully reviewing the Complaint, as well as the Federal Election Commission database and internal contribution records, Mrs. Goldman Fowler took corrective action by requesting refunds of all contributions that appear to exceed the biennial aggregate limit for 2011-2012. To date, Mrs. Goldman Fowler has received refunds in the amount of \$100,100, including \$67,600.00 in refunds from party and political action committees and \$32,500 from candidate committees. This represents refunds from 27 of the 28 committees from which they were requested.<sup>1</sup>

In addition to seeking refunds to place herself in compliance with the 2011-2012 limits, Mrs. Goldman Fowler has retained Holland & Knight LLP to help ensure FEC compliance moving forward, and continues to utilize the firm's services on a regular basis to ensure that her political contributions are fully vetted and do not exceed currently applicable limits.

Any violations of the 2011-2012 biennial aggregate contribution limits on the part of Mrs. Goldman Fowler were inadvertent and she had no intention of violating the Federal Election Campaign Act of 1971, as amended, FEC regulations, or any other law. She has made every effort to correct potential violations and has worked with her counsel to implement a compliance


<sup>1</sup> Despite attempts to do so, Mrs. Goldman Fowler was unable to secure a refund of from the Friends of Julian Schreibman Committee because the Commission approved that Committee's termination effective July 30, 2013.

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plan to review future contributions. Accordingly, the Commission should exercise its prosecutorial discretion and dismiss this Complaint as it applies to Mrs. Goldman Fowler.

Thank you.

Sincerely,

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Christopher DeLacy

Christopher DeLacy

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